

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Goat Hill Compressor Station  
CenterPoint Energy Field Services, Inc.  
Haughton, Bossier Parish, Louisiana  
Agency Interest Number: 121323  
Activity Number: PER20080003  
Proposed Permit Number: 0040-00131-V5**

**I. APPLICANT**

**Company:**

CenterPoint Field Services, Inc.  
1111 Louisiana Ave., 11th Floor  
Houston, TX 77002

**Facility:**

Goat Hill Compressor Station  
7 Miles South of I-20 on Goat Hill Road  
Haughton, LA 71037  
Approximate UTM coordinates are 450.82 kilometers East and 3,589.52 kilometers North in Zone 15

**II. FACILITY AND CURRENT PERMIT STATUS**

Goat Hill Compressor Station is a natural gas gathering compressor station which compresses natural gas using compressor engines. Glycol dehydrators serve to remove water from produced natural gas streams. The dehydrators are equipped with a vapor recovery system which condenses all hydrocarbons that are condensable. The non-condensable hydrocarbons are routed to the reboilers for combustion.

The previous permit for this facility is General Part 70 Operating Permit No. 0040-00131-V4.

**III. PROPOSED PROJECT/PERMIT INFORMATION**

**Application**

A permit application and Emission Inventory Questionnaire, dated October 27, 2008, were submitted by CenterPoint Energy Field Services, Inc. requesting a Part 70 operating permit.

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**Project**

No physical changes or changes of operation method are involved with this permit. Since some of the compressor engines will be subject to the requirements of NSPS Subpart JJJJ, the permit for the Goat Hill Compressor Station will be changed from a general Part 70 operating permit to a regular Part 70 operating permit.

**Proposed Permit**

Permit 0040-00131-V5 will be a regular Part 70 operating permit for the Goat Hill Compressor Station.

**Permitted Air Emissions**

Estimated emissions from the facility in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	6.18	6.18	-
SO <sub>2</sub>	0.42	0.42	-
NO <sub>x</sub>	328.38	328.38	-
CO	140.60	140.60	-
VOC	98.20	105.47	+ 7.27

**IV REGULATORY ANALYSIS**

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the permit.

**Prevention of Significant Deterioration/Nonattainment Review**

No physical changes or changes of operation method are involved with this permit. Therefore, PSD review is not required.

**MACT Requirements**

This facility is subject to the federal MACT requirements of 40 CFR 63, Subpart ZZZZ. Detailed requirements are provided in the Specific Requirements section of the permit.

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**Air Quality Analysis**

Emissions associated with the proposed permit were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of each proposed Part 70 operating permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the permit.

**V. PERMIT SHIELD**

No permit shield is requested.

**VI. PERIODIC MONITORING**

All monitoring requirements necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Specific Requirements section of the permit.

**VII. GLOSSARY**

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H<sub>2</sub>S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

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New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO<sub>x</sub>) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub> – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.